

GUILDFORD BOROUGH COUNCIL LOCAL PLAN STRATEGY AND SITES

PROPOSED SUBMISSION CONSULTATION REPRESENTATIONS ON BEHALF OF SEND PARISH COUNCIL

July 2016

Contents

1. Introduction.....	3
2. Proposed Allocations for Housing Provision.....	3
3. Distribution of Housing	5
4. Strategic Road Network Infrastructure Allocations SRN9 and SRN10.....	7
5. Allocations in Send, Send Marsh and Burnt Common	11
6. Policy D4 – Development in Urban Areas and Inset Villages	15
7. Summary of Proposed Changes and Conclusions	15

1. Introduction

1.1 Tibbalds Planning and Urban Design is the appointed planning consultant acting on behalf of Send Parish Council. These representations relate to the June 2016 consultation of the Proposed Submission version of the Local Plan: Strategy and Sites document, which is open for consultation until Monday 18 July.

1.2 This supporting statement challenges the overall level of proposed housing provision in the Borough, focusing specifically on draft housing, employment and transport allocations in Send, Send Marsh and Burntcommon. This statement sets out objections to the following allocations:

Site A42 – Clockbarn Nursery, Tannery Lane, Send – 45 homes

Site A43 – Land at Garlick’s Arch – employment and 400 homes

Site A43a – Land for new north and south facing slip roads to/from A3 at Send Marsh / Burnt Common

Site A44 – Land West of Winds Ridge – 40 homes and 2 traveller pitches

SRN9 A3 northbound on-slip at A247 Clandon Road

SRN10 A3 southbound off-slip at A247 Clandon Road

1.3 Send Parish Council also request that the Local Plan provides the opportunity for sites in inset villages to be allocated through the neighbourhood plan process, allowing local communities to identify and allocate the most appropriate sites for development.

2. Proposed Allocations for Housing Provision

2.1 Send Parish Council consider the proposed level of housing provision to be unsound due to the number of allocated homes being significantly greater than the identified need. Whilst Send Parish support an approach to housing delivery that meets the objectively assessed need in the Borough, the allocations set out in the June 2016 Proposed Submission Local Plan represent over-development. The following section demonstrates that sufficient justification has not been provided for the levels of residential development proposed.

2.2 The West Surrey Strategic Housing Market Area is comprised of Guildford, Waverley and Woking Boroughs. The September 2015 West Surrey Strategic Housing Market Assessment (SHMA) identifies a need for 693 Dwellings Per Annum (DPA) in Guildford. Policy S2: *Borough Wide Strategy*, of the Proposed Submission Local Plan expects a total of 10,395 homes to be delivered between 2018 and 2033. This results in an average of 693 DPA in accordance with the SHMA.

2.3 Table 1 of Policy S2 sets out the planned delivery of housing between 2018 and 2033. Sufficient allocations are made to deliver 13,652 homes in this period; an average of 910 DPA, or 131% of the requirement identified in the SHMA. Paragraph 4.1.12 of the Proposed Submission Local Plan acknowledges that the

number of homes set out in table 1 is greater than the number of homes required by policy S2 and that this is deliberate in order to build in flexibility.

- 2.4 The Guildford Borough Economy and Infrastructure Executive Advisory Board met on 13 April 2016 to review the draft Local Plan before it was released for consultation. Concern was raised regarding the over provision of land allocated in the Proposed Submission Local Plan when compared to the Objectively Assessed Need (OAN) figure. The Leader of the Council confirmed that this was required to ensure that the Council could meet the OAN by enabling Guildford Borough Council to have flexibility, however no justification was provided for the significant over provision.
- 2.5 No evidence is presented to justify allocating sites to provide 131% of the objectively assessed need. Whilst some allocated sites will inevitably not be brought forward, sites should only be allocated if they are genuinely considered to be deliverable. If the Council has evidence to suggest that approximately a quarter of the allocated sites are undeliverable then this calls for a serious re-appraisal of the proposed allocations. The Parish Council consider an approach to allocation in line with national policy to be more appropriate.
- 2.6 The March 2012 National Planning Policy Framework (NPPF) paragraph 47 clearly sets out the requirements for Local Planning Authorities to deliver housing through the Local Plan process. Councils should use the evidence base to ensure that the full OAN for the housing market area is met. This is recognised as 693 DPA.
- 2.7 NPPF Paragraph 47 requires that planning authorities demonstrate on an annual basis that there is a sufficient supply of land for five years' worth of housing, with an additional buffer of 5%. This can be increased to a 20% buffer where there is persistent under delivery of housing. This gives a strong indication of the level of provision that the Council should be planning for and a buffer of 5% to 20% would be considered to be a far more appropriate level of flexibility. Based upon the requirement for 693 DPA, this would necessitate between 727 DPA and 832 DPA (as compared to 910 DPA provided for in the draft Local Plan), or sufficient allocations for between 10,915 and 12,474 homes. This suggests that there is currently a proposed over-allocation of between 1,178 and 2,737 homes throughout the plan period.
- 2.8 Send Parish are concerned that this has resulted in the allocation of sites that are not suitable for development. Sections three, four and five of this statement addresses this point further.

3. Distribution of Housing

Settlement Hierarchy

- 3.1 The May 2014 Settlement Hierarchy Document is identified as key evidence in the Proposed Submission Local Plan. This document divides the settlements in Guildford Borough into the following hierarchy in order to promote sustainable development:
1. Urban Area (Guildford)
 2. Rural Service Centre x 1
 3. Large Villages x 11
 4. Medium Villages x 6
 5. Small Villages x 6
 6. Loose knit / hamlets x 13
- 3.2 Send, Send Marsh and Burnt Common are considered to be large villages, although chapter 4 recognises that Send Marsh / Burnt Common are only identified as a large village due to the proximity to Send's services. Otherwise, Send Marsh / Burnt Common would be categorised as a medium village.
- 3.3 Paragraph 3.4.2 states that large rural villages are unsuitable for substantial growth but capable of accommodating an extension. Medium sized villages are unsuitable for substantial growth but capable of taking appropriate residential infill and development to meet local needs, defined as '*employment, amenity and community facilities as well as small scale infill housing and rural exception sites for affordable housing*'. Send Parish consider the proposed level of development in Send Marsh / Burnt Common to represent substantial and inappropriate growth, contrary to this strategy for development.
- 3.4 Section 3.2 and 3.3 of the May 2014 Settlement Hierarchy Document assesses the sustainability of each of the settlements in the Borough, taking into consideration community facilities, access to public transport and employment opportunities. This document recognises that Send has a population of 2,314 and Send Marsh / Burnt Common has a population of 1,931. The report sets out functional rankings for all settlement's in the Borough; Send, Send Marsh and Burnt Common are scored as 15/40 for the community facilities, infrastructure and transport. For comparison, Shackleford, Shalford, Albury, Wanborough, Homsbury St Mary, Jacobs Well, Gomshall, Chilworth, Effingham, West Clandon and Peaslake all have higher functional rankings, indicating that the Send area is inappropriate for any significant levels of development due to the lack of social infrastructure. Development should be focused in the most sustainable locations available.
- 3.5 Paragraph 10.7.1 of the June 2016 Sustainability Appraisal recognises that '*the proposed allocation at Send Marsh / Burnt Common (400 homes) potentially stands out as being some distance from a GP surgery*'. The May 2014 Settlement Hierarchy Report also demonstrates that Send, Send Marsh and

Burnt Common have relatively poor community facility provision, especially in regards to shops and public transport.

- 3.6 The Send Medical Centre is not served by local busses, making it particularly difficult for those with mobility problems to attend. The parking facilities at the village shops are limited and not suitable for disabled access. Send only has hourly bus services to Guildford, with poor evening and weekend services, indicating that new homes would be very dependent on cars. In light of the recognised congestion on the A3, residential development would be far better located in areas with good access to public transport and community facilities.
- 3.7 The June 2016 Proposed Submission Local Plan allocates three sites in Send and Send Marsh / Burnt Common:
- Site A42 – Clockbarn Nursery, Tannery Lane, Send – 45 homes
 - Site A43 – Land at Garlick’s Arch – employment and 400 homes
 - Site A43a – Land for new north and south facing slip roads to/from A3 at Send Marsh / Burnt Common
 - Site A44 – Land West of Winds Ridge – 40 homes and 2 traveller pitches
- 3.8 The proposed allocation of site A43 for 400 homes would result in a population increase of 48% in Send Marsh / Burnt Common, assuming an average of 2.3 people per dwelling (this is based upon the average set out in the 2011 UK census). This represents an average population increase of 3.2% per annum across the plan period, significantly higher than ONS projections of 0.57% per annum for the UK for the same period.
- 3.9 For comparison, allocations A42 and A44 would result in a population increase of 8% in Send across the plan period, or 0.5% per annum. Whilst the Parish Council do not support draft allocations A42 and A44, they consider this population increase to represent a more organic rate of growth for a settlement of this size.
- 3.10 Send Parish object to the proposed level of residential allocations on the grounds that they do not represent sustainable development. Considering there is a demonstrable over-allocation of housing beyond what is required to meet the Borough’s objectively assessed needs, the number of allocated homes in Send Marsh / Burnt Common should be significantly reduced.
- 3.11 Sections four and five of this report address the allocations that the Parish consider to be inappropriate and unsustainable.

4. Strategic Road Network Infrastructure Allocations SRN9 and SRN10

Background

- 4.1 Send Parish Council object to the proposed new A3 northbound and southbound slip roads at A247 Clandon Road, to be delivered on the land covered by allocation A43a. A review of previous iterations of the Local Plan and the associated evidence base shows that these draft allocations have been made very recently and have not been properly appraised.
- 4.2 The July 2013 Infrastructure Baseline study considered the quality and capacity of the existing infrastructure in the Borough and was used to inform the more detailed infrastructure and transport strategies developed throughout the Local Plan process. Chapter 2 of this document identified the A3 as the key Strategic Road Network (SRN) in the Borough and recognised that the form and standard of the A3 through the borough was deficient in quality and capacity, resulting in congestion and unreliable journey times. This baseline has been used to influence the allocation of sites and how infrastructure could be upgraded.

Local Plan Transport Infrastructure Allocations

- 4.3 The various iterations of the draft Local Plan from October 2013 through to June 2016 set out the following approaches to transport infrastructure in the Borough.
- 4.4 The October 2013 Issues and Options Local Plan recognises the need to balance development with traffic congestion and minimise the impact of traffic on local communities. The document also recognises the need to focus new development that will generate significant movement in locations where the need to travel will be minimised and the use of sustainable transport modes can be maximised. This document does not set out specific allocations for transport infrastructure.
- 4.5 The July 2014 Draft Local Plan contained more detailed policy relating to transport and infrastructure. Policy 17 states that the key infrastructure needed to support plan delivery is provided in the infrastructure schedule at Appendix B. This schedule makes no reference to any requirement for a new junction at the A247. This version of the Local Plan allocates 431 homes in Send and Send Marsh / Burnt Common.
- 4.6 The Guildford Borough, Economy and Executive Advisory Board met on 13 April 2016 to discuss the draft version of the Proposed Submission Local Plan. The supporting briefing note states that delivery of the development contained within the Proposed Submission Local Plan is dependent on the delivery of the necessary infrastructure. The infrastructure schemes that the Council considered to be necessary for the delivery of the Proposed Submission Local Plan were included in Appendix C. Allocations SRN9 or SRN10 are not included in the schedule and no other references were made to the need for these schemes.

- 4.7 The Guildford Council Executive met on 11 May 2016 to review the draft Proposed Submission Local Plan. Appendix C contains a list of infrastructure that the Council considers to be necessary to deliver development contained in the Local Plan. This does not include allocations for new A3 northbound and southbound slip roads at A247 Clandon Road. Allocation SRN9 is for ‘A3 southbound off-slip lane widening to A320 Stoke Interchange improvement scheme’, a completely unrelated scheme.
- 4.8 The first reference to the proposed new A3 northbound and southbound slip roads at A247 Clandon Road appears in Appendix C of the draft Local Plan considered by the Full Council on 24 May 2016. Although this significant change is not included within the published schedule of changes, the proposed slip roads are included in Appendix C under references SRN10 and SRN11.
- 4.9 The 6 June 2016 consultation version of the Proposed Submission Local Plan includes the proposed slip roads in Appendix C as follows:

SRN9 - A3 northbound on-slip at A247 Clandon Road
 SRN10 - A3 southbound off-slip at A247 Clandon Road

- 4.10 Send Parish Council are seriously concerned by the very late allocation of such significant pieces of road infrastructure. It appears that even on 11 May 2016, less than a month before the document was published for consultation, the proposed slip roads were not considered to be necessary to support the proposed site allocations. It appears that allocations SRN9 and SRN10 were added in response to the very late change of allocation A43 in Send and have not been given proper consideration.
- 4.11 Send Parish Council object in the strongest possible terms to allocations SRN9 and SRN10. Paragraph 182 of the NPPF explicitly states that in order for a plan to be considered sound, it must be ‘*the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence*’. It is clear from the chronology of the allocations set out above that these allocations have been added to the plan at the latest possible opportunity and at the final round of consultation. In order for the plan to be positively prepared, allocations of this scale should have been considered and made available for public comment far earlier in the consultation process. The following paragraphs set out how the supporting evidence base does not demonstrate how these proposed allocations have been carefully considered as part of an appropriate strategy based on proportionate evidence.

Evidence Base

- 4.12 The June 2016 Proposed Submission Local Plan is supported by three key documents setting out the transport evidence base. These are:
1. June 2016 Guildford Borough Transport Strategy
 2. June 2016 Topic Paper - Transport
 3. June 2016 Strategic Highways Assessment
- 4.13 The June 2016 Guildford Borough Transport Strategy sets out transport proposals to be delivered in accordance with the needs of transport providers,

fundes and the Council's own transport evidence base. Proposals SRN9 and SRN10 are included as '*anticipated improvements*' on page 10 and the indicative programme on page 22. No additional background to these schemes is provided.

4.14 The June 2016 Transport Topic Paper sets how the transport strategy was developed. SRN9 and SRN10 are included in a list of transport schemes at Appendix 3. In reference to SRN9 and SRN10 Paragraph 5.52 states '*these junctions are being promoted to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield site (site allocation Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange*'. No additional background information is provided.

4.15 The June 2016 Strategic Highways Assessment is a strategic transport modelling study that informs decision making surrounding the suitability of potential development sites and future highway mitigation proposals which have been identified. Appendix A sets out the strategic residential sites assessed as part of the highways assessment. The main residential site in Send is as follows:

Ref. 2258 - Land south east of London Road Land south east of London Road, Send (part of B13-d) (known as Burnt Common) 260 homes and 140 flats.

4.16 It is unclear which site this refers to. Site 2258 appears to be a reference to the Feb 2016 LAA site reference for the 'Land at Garlick's Arch', however the site description appears to refer to the Land around Burnt Common Warehouse, formerly allocated as Site A43. The B13-d reference appears to relate to the January 2013 Green Belt and Countryside Review area around Burnt Common, not Garlick's Arch, which falls under land parcel B14 in this document. This shows a high degree of inconsistency in the appraisal and it is unclear which site is even appraised. It is possible that this was changed shortly before the Local Plan was released for consultation with the updated A43 and A43a allocations in May 2016, but it indicates that this piece of evidence is inconsistent and should be ascribed little weight.

4.17 In addition to these three evidence base documents, the June 2016 Draft Infrastructure Delivery Plan provides detail on the infrastructure needed to support development included in the Proposed Submission Local Plan 2016. This document includes a repeat of the Infrastructure Schedule included in Appendix 2 of the June 2016 Proposed Submission Local Plan but provides no additional assessment of the justification or potential impact of proposals SRN9 and SRN10.

4.18 Overall there is very little evidence available to the public explaining why the new A3 northbound and southbound slip roads at A247 Clandon Road are necessary or justified. It is suggested that SRN9 and SRN10 are necessary in order to mitigate traffic flows from allocation A35 at Wisley Airfield, however it is not at all clear why a development 4km to the north east of Send with an existing junction to the A3 from Portsmouth Road and the B2039 directly to the west of the site requires a new junction at Send. Wisley Airfield was considered for allocation in the October 2013 Issues and Options Local Plan and allocated in the July 2014 Draft Local Plan for 2,100 homes. New slip roads at Send were not considered to

be necessary to support this allocation in July 2014 and the allocation for Wisley Airfield is for an identical number of homes in the June 2016 Proposed Submission Local Plan. It is therefore clear that allocations SRN9 and SRN10 are not required to support allocation A35 at Wisley Airfield.

4.19 Until the most recent versions of the Proposed Submission Local Plan, allocation A43 Land around Burnt Common Warehouse, was allocated for up to 7,000 sqm of B1c/B2/B8 employment uses. This allocation was not considered to require a new junction to the A3 despite being allocated for an identical level of employment provision as Garlick's Arch. Policy E1 of the June 2016 Proposed Submission Local Plan states that when developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common, will be treated as a Strategic Employment Site (allocation A43). The Parish notes that in the draft of the Proposed Submission Local Plan, reviewed by the Council's Executive Committee on 11 May 2016, Policy E2 states that the new employment site at Burnt Common will be treated as a Strategic Employment Site. The Council has therefore recognised that both sites could be considered to be Strategic Employment Sites and that the Burnt Common Warehouse Strategic Employment Site allocation would not require a new junction to be considered acceptable. This adds further weight to the argument that the new junction works are not necessary and have not been carefully considered.

4.20 The chronology of site allocations appears to indicate that allocations SRN9 and SRN10 have been added at the same time as the A43 and A43a allocations in May 2016. We have set out in the following section why Allocation A43 and A43a are unsound and wholly unjustified, but independently of this Send Parish Council object to the proposed new A3 / A247 slip roads ref. SRN9 and SRN10 on the grounds that there is no indication that they have been justified by the evidence available and that the allocations are unsound on the basis that they have not been positively prepared and are not based upon a strategy which seeks to meet objectively assessed development and infrastructure requirements.

Proposed Changes to Make the Local Plan Sound

4.21 Remove allocations SRN9 and SRN10.

5. Allocations in Send, Send Marsh and Burnt Common

5.1 Send Parish Council object to the following allocations set out in the June 2016 Proposed Submission Local Plan:

Policy A42: Clockbarn Nursery, Tannery Lane, Send
 Policy A43: Land at Garlick's Arch, Send Marsh/Burnt Common and Ripley
 Policy A43a: Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common
 Policy A44: Land West of Winds Ridge and Send Hill, Send

5.2 The reasons for the objections are set out below.

Site A43a

5.3 Site A43a is to be occupied by infrastructure allocations SRN9 and SRN10. Section four of this report details why the new slip roads are unjustified and should be considered to be unsound. On this basis allocation A43a which is specifically allocated to build the slip roads should be removed for the same reasons.

Site A43 Garlick's Arch

5.4 Send Parish Council object to allocation A43 on the grounds that it is not justified. The site is allocated for 400 C3 residential units and up to 7,000 sq m of B1c/B2/B8 employment use, however this major allocation has only been included in the most recent versions of the draft Local Plan and is not supported by the evidence base.

5.5 The July 2014 Draft Local Plan allocated three sites in Send, Send Marsh / Burnt Common for whole or partial development for residential purposes. These sites are as follows:

Site 74 - Land around Burnt Common warehouse, London Road, Send - B employment uses and up to 100 homes
 Site 75 - Land at Tannery Lane, Send (including Clockbarn Nurseries) - 215 homes
 Site 76 - Land to east of Aldertons Farm, Send Marsh - 116 homes

5.6 This 2014 version of the Local Plan allocated a total of 431 homes in Send and Send Marsh / Burnt Common. This is compared to 185 homes allocated in the initial draft of the Proposed Submission Local Plan (dated May 2016) before allocation A43 was changed. This clearly indicates that following the 2014 consultation it was recognised that 431 homes in Send was over development. The reduction to 185 reflects a more appropriate level of development. The last minute change to 485 homes in the most recent version of the Proposed Submission Local Plan represents a significant increase that is clearly unjustified by the evidence base.

- 5.7 After consulting on the Local Plan in July 2014, the Council drafted an updated version of the Local Plan for review by the Council before being published for consultation in June 2016. This version of the draft Local Plan was considered by the Economy and Infrastructure Executive Advisory Board (The 'Board') on 13 April 2016 and included the following allocations for Send, Send Marsh and Burnt Common. The Board did not raise any concerns or propose any changes to these allocations:
- Site A42 – Clockbarn Nursery, Tannery Lane, Send – 45 homes
 Site A43 – Land around Burnt Common Warehouse, London Road, Send – 100 homes with B employment uses
 Site A44 – Land West of Winds Ridge – 40 homes
- 5.8 Send Parish Council has previously raised concerns about the suitability of these sites due to the lack of capacity on narrow local roads, but consider an allocation of 185 homes to represent a more appropriate level of development than the 485 now included with the draft Submission Local Plan. The Parish may wish to have the opportunity to allocate appropriate sites through the neighbourhood plan process.
- 5.9 The Guildford Council Executive met on 11 May 2016 to review the draft Proposed Submission Local Plan before it was published for consultation. The draft version of the Plan included the same allocations as were reviewed on 13 April 2016, however as a result of this meeting the decision was made to remove from the draft Local Plan site allocation policy A43 Land around Burnt Common Warehouse and replace it with a new site known as Garlick's Arch, with proposals for 400 homes and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) uses. The justification for this change is provided as *'the Interim Director of Development be authorised, in consultation with the Leader of the Council, to make such minor alterations to improve the clarity of the document as he shall deem appropriate'*.
- 5.10 The reasons for this last minute change in allocation are wholly unjustified. Firstly, it is unreasonable to consider the proposed changes to be 'minor' considering they involve allocating a further 300 homes to a village with a population of only 1,931 and delete the previous allocation around Burnt Common Warehouse that has been carefully considered, consulted upon and adapted since the first iteration of the Local Plan Issues and Options Paper in October 2013. This is a wholly inappropriate approach to the Local Plan making process and represents bad practice.
- 5.11 At no point up to May 2016 had any allocation been made relating to the Garlick's Arch site. It had been included in the February 2016 Land Availability Assessment ref. 2258, but had not been allocated. Since the site was only identified as a potentially developable site in February 2016 and was not included in drafts of the Proposed Submission Local Plan as late as May 2016, this indicates that insufficient consideration has been given to its allocation.
- 5.12 Section 21 of the January 2013 Green Belt and Countryside Study examined how Green Belt Boundaries could be re-defined around Send Marsh and Burnt Common to accommodate a major settlement expansion. This study includes the land at Garlick's Arch as plot B14-A. The appraisal recognises that Send Marsh

and Burnt Common lack community facilities and would require a significant population increase far beyond what is currently proposed in order to create a ‘critical mass’ of population. This indicates that the current proposal for 400 new homes on the Garlick’s Arch site would introduce homes to a settlement with few facilities, requiring new residents to travel to other settlements for work, shopping and leisure. Indeed, Sustainability Appraisal of the draft Submission Local Plan, in Appendix IV Site Options, appraises all sites considered potentially suitable for allocating in the Local Plan. A traffic light approach is used to appraise individual sites. Allocation A43, Garlick’s Arch, is considered to be the poorest performing of the sites considered potentially suitable in Send, Send Marsh and Burnt Common, with red traffic lights against the following criteria: SNCI/LNR; key employment site; flood risk; recreation facility; town/district/local centre or shop; primary school; secondary school; high quality agricultural land; previously developed land; and railway station. In fact, the Sustainability Appraisal considers it to be one of the poorest performing of all sites considered to have potential.

- 5.13 Send Parish Council consider the Land around Burnt Common Warehouse to be a more appropriate allocation that has been given the necessary consideration through the Local Plan consultation process. Despite the late changes outlined above, the Key Diagram contained within the proposed Submission Local Plan (page 18) indicates that land around Burnt Common Warehouse is identified as a Strategic Employment Site rather than that at Garlick’s Arch. The draft Proposed Submission Local Plan was reviewed by the Guildford Borough Executive Committee. The supporting papers for this meetings stated:

“Send Marsh/Burnt Common – this site is located in a yellow (medium) sensitivity land parcel. Our Employment Land Needs Assessment identifies a need for industrial land and this site is the only suitable and deliverable site identified by the Green Belt and Countryside Study that could meet this need”.

- 5.14 No evidence is provided to explain how circumstances changed in the following month before the Local Plan was published for consolation to justify the change in allocation. It would appear from the meeting minutes that this change was only made to accommodate additional housing and a new slip road to the A3, but as this statement demonstrates in sections two, three and four, these changes are unsustainable, unjustified and unnecessary.

Site A42: Clockbarn Nursery, Tannery Lane, Send

- 5.15 The Parish is very concerned that additional development will exacerbate the existing traffic congestion in the village. The cumulative impact of proposed allocation A44, Send Business Centre and unimplemented planning permission 14/P/02289 for a new marina to the north of Tannery Lane could introduce significant levels of new traffic to the surrounding streets.
- 5.16 Tannery Lane is narrow, making it very difficult for vehicles to pass along the entire length, especially for larger commercial vehicles. This often results in vehicles needing to reverse to find a suitable passing place. Currently short-term parking occurs along Tannery Lane and Send Road, which can lead to reductions in visibility for drivers emerging from the side road. Tannery Lane narrows towards the northern end and the 400m stretch before the junction with

Polesden Lane is c.2.75m wide. The road cannot be widened due to the adjacent nature reserve.

- 5.17 Tannery Lane also provides poor pedestrian access. There is a short section of pavement on the southern side of the lane, running approximately 100m north east of Send Road. The remainder of Tannery Lane has no provision for pedestrians, with few opportunities for improvement due to the narrow carriageway.
- 5.18 Although Environment Agency flood maps include the site in flood zone 1, the land currently floods, despite recent improvements to drainage. Send Parish therefore urge the Council to re-consider this proposed allocation in light of traffic and flooding issues.

Site A44 – Land West of Winds Ridge

- 5.19 This site is allocated for 40 homes and 2 traveller pitches. The Parish is concerned about the proposed access arrangements since Send Hill is a very narrow road; two cars have difficulty passing one another in places. An additional 40 homes would significantly increase the chances of two cars meeting, resulting in congestion and access issues with little scope to widen the road. This site is over 1km from the shops and the nearest bus stops in the centre of Send. Send Hill does not have any pavements for the majority of its length and would be difficult to walk along, especially for those with push chairs or mobility problems. The Parish Council are also concerned about the impact that increased traffic on Send Hill will have on the adjacent multi-denominational cemetery. This site is used by local people as a quiet place for contemplation. Resident's enjoyment will be diminished by an increase in passing traffic, especially during construction.
- 5.20 Send Parish Council question whether the proposed allocation for two traveller pitches is appropriate in light of the Council's evidence base. The most recent Traveller Accommodation Assessment is from June 2012. This identifies the number of pitches that are needed within the borough and is listed under the evidence base for the June 2016 Proposed Submission Local Plan. The 2012 assessment appears to have been used as a basis for current draft policies and the 2016 Land Availability Assessment.
- 5.21 The government's most recent policy for traveller sites was published in August 2015 and sets out the best approaches for planning for traveller sites. Since the Borough's current Traveller Accommodation Assessment was published significantly before the 2015 guidance, it should be considered out of date. The dated nature of the 2012 assessment is recognised in the June 2016 Sustainability Appraisal, which states on page 94 that the Council have decided to over-allocate traveller sites in light of the dated evidence base.
- 5.22 The Parish Council consider this approach to be unsound and therefore request that the evidence base for the total number of traveller pitches required is re-visited to ensure that it is up to date.

Neighbourhood Plans

- 5.23 The Local Plan should provide the opportunity for sites in inset villages to be allocated through the neighbourhood plan process, allowing local communities to

identify and allocate the most appropriate sites for development in accordance with neighbourhood planning principles and general conformity with strategic policy.

Proposed Changes to Make the Local Plan Sound

- 5.24 Remove allocations A43 Garlick’s Arch and A43a Slip roads.
- 5.25 Reinstate allocation A43 Land around Burnt Common Warehouse, as set out in drafts of the Proposed Submission Local Plan reviewed by the Borough, Economy and Infrastructure Executive Advisory Board on 13 April 2016.
- 5.26 Remove allocations A42 and A44 in order to allow the Parish Council the opportunity to allocate suitable alternative sites through the Local Plan process.

6. Policy D4 – Development in Urban Areas and Inset Villages

- 6.1 Policy D4 of the Proposed Submission Local Plan sets out the approach to development in inset villages. The Inset villages were ‘washed over’ by Green belt allocations until recently and are still characterised as small settlements in rural areas. Send and Send Marsh / Burnt Common are already been subject to significant allocations that will fundamentally change the character of the settlements.
- 6.2 Para 4.3.12 of the Proposed Submission Local Plan notes that where villages are inset from the Green Belt, other development management policies should be used to restrict any inappropriate development. Policy D4 as phrased would allow proposals for development to come forward in addition to the site allocations identified in the Proposed Submission Local Plan.

Proposed changes to the Local Plan

- 6.3 The Parish Council request that Policy D4 is amended to defer to a neighbourhood plan where there is one in place, allowing this to establish sites for appropriate infill development in line with the general principles of strategic policy. Otherwise this policy could essentially override any sites identified by neighbourhood plans.

7. Summary of Proposed Changes and Conclusions

- 7.1 In summary, Send Parish consider the following changes to be necessary to make the Proposed Submission Local Plan sound:
 - i. Remove transport infrastructure allocations SRN9 and SRN10;**
 - ii. Remove allocations A43 Garlick’s Arch and A43a slip roads;**

- iii. **Reinstate allocation A43 Land around Burnt Common Warehouse, as set out in drafts of the Proposed Submission Local Plan reviewed by the Borough, Economy and Infrastructure Executive Advisory Board on 13 April 2016;**
- iv. **Remove allocations A42 and A44 in order to allow the Parish Council the opportunity to allocate suitable alternative sites through the Neighbourhood Plan process.**
- v. **Review the process that has been used to determine the number of traveller pitches required in light of out of date evidence base.**
- vi. **Amend Policy D4 to provide scope for neighbourhood plans to identify appropriate sites and policies within the inset villages.**

7.2 Send Parish are pleased to have the opportunity to respond to the draft Local Plan and request that they are informed of any future consultation events.